

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA

v.

DAVID A. BILLINGTON

No. 3:14-00011

Chief Judge Haynes

JOINT MOTION TO CONTINUE PLEA HEARING

COME NOW the Defendant, **David A. Billington**, and the government, by and through their respective undersigned counsel, and respectfully request that this Honorable Court enter an Order continuing the Plea Hearing scheduled for March 24, 2014 at 1:30 p.m. (Docket Entry 7) to either the afternoon of Monday, April 7, 2014 or the afternoon of Tuesday, April 8, 2014. In support hereof, the parties state as follows:

1. The government and Defendant Billington have reached a plea agreement in this case. The accompanying Plea Petition and Plea Agreement have been finalized by the parties and will be provided to the Court by AUSA Hester this week. Defense counsel have reviewed the plea documents with Defendant Billington, and the parties are prepared to proceed with a Plea Hearing.
2. However, both counsel for the defense and the government have scheduling conflicts with the current March 24, 2014 Plea Hearing date in this case. The parties have consulted their calendars and jointly propose resetting the Plea Hearing on either the afternoon of Monday, April 7, 2014 or the afternoon of Tuesday, April 8, 2014.
3. The trial of this case is scheduled for Tuesday, April 8, 2014, but will be entirely unnecessary. Defendant Billington will execute a waiver of speedy trial if the Court so

QUADSK
The motion
to GRANT BP
The hearing is
set for April
7, 2014
at
1:30pm
will be
USDP
3-19-14